

To: CN=Chip Humphrey/OU=R10/O=USEPA/C=US@EPA[]
Cc: CN=Kristine Koch/OU=R10/O=USEPA/C=US@EPA;CN=Richard Muza/OU=R10/O=USEPA/C=US@EPA[]; N=Richard Muza/OU=R10/O=USEPA/C=US@EPA[]
Bcc: []
From: CN=Sean Sheldrake/OU=R10/O=USEPA/C=US
Sent: Thur 5/17/2012 4:38:46 PM
Subject: Re: PH supplemental data collection
<http://www.epa.gov/region10/dive>
<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/DSBtechdirector>
<http://www.epa.gov/region10/portlandharbor>
<http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>
<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener+cleanups>
<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&SecI>
<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>

Thanks Chip--keep me in the loop as there are some QA issues with sample collection, however collected, that I'd like to help with...S

Sean Sheldrake, RPM, Unit Diving Officer
USEPA, Region 10
Environmental Cleanup Office
1200 Sixth Avenue, Suite 900, ECL-110
Seattle WA 98101-3140
sheldrake.sean@epa.gov
Phone: 206/553-1220
Region 10 Dive Team: <http://www.epa.gov/region10/dive>
EPA Divers only: <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/DSBtechdirector>
Portland Harbor Cleanup: <http://www.epa.gov/region10/portlandharbor>
Green Cleanups: <http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>
Green Cleanups (EPA only):
<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener+cleanups>
Health and Safety (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&SecI>
Deliveries: Parking Garage mailroom (1st floor)
Visitors: Check-in @ PERC / Service Center on 12th floor:
<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>

From: Chip Humphrey/R10/USEPA/US
To: Sean Sheldrake/R10/USEPA/US@EPA
Cc: Kristine Koch/R10/USEPA/US@EPA, Richard Muza/R10/USEPA/US@EPA
Date: 05/17/2012 07:43 AM
Subject: Re: PH supplemental data collection

yes, these are surface samples and diver collection may be the way to go. Will keep you in the loop as we start pulling this together.

-----Sean Sheldrake/R10/USEPA/US wrote: -----
To: Chip Humphrey/R10/USEPA/US@EPA
From: Sean Sheldrake/R10/USEPA/US
Date: 05/16/2012 08:46PM
Cc: Kristine Koch/R10/USEPA/US@EPA, Richard Muza/R10/USEPA/US@EPA

Subject: Re: PH supplemental data collection

Chip, If I understood Kristine correctly, these are surface sediment samples (that must be collected by divers, ie. top 2-4 cm) vs. cores, correct?

If so, let me know if you want /need EPA dive team support on this (I'll need to schedule as far as out as possible, especially if it's long duration--I'll solicit ERT involvement)--otherwise, if it is contracted out, I will need some lead time to make sure the scientific diving undertaken for EPA meets our safety requirements.

Thanks!

S

Sean Sheldrake, RPM, Unit Diving Officer
USEPA, Region 10
Environmental Cleanup Office
1200 Sixth Avenue, Suite 900, ECL-110
Seattle WA 98101-3140
sheldrake.sean@epa.gov
Phone: 206/553-1220

Region 10 Dive Team: <http://www.epa.gov/region10/dive>
EPA Divers only: <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/DSBtechdirector>
Portland Harbor Cleanup: <http://www.epa.gov/region10/portlandharbor>
Green Cleanups: <http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>
Green Cleanups (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener+cleanups>
Health and Safety (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&Sec1>
Deliveries: Parking Garage mailroom (1st floor)
Visitors: Check-in @ PERC / Service Center on 12th floor:
<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>

Chip Humphrey---05/16/2012 03:15:06 PM---Dan Deb asked me to send you info on the additional sampling that we briefly discussed with Bob Wya

From: Chip Humphrey/R10/USEPA/US
To: Opalski.Dan@epa.gov
Cc: yamamoto.deb@epa.gov, Kristine Koch/R10/USEPA/US@EPA, Sheldrake.Sean@epa.gov, muza.rich@epa.gov
Date: 05/16/2012 03:15 PM
Subject: PH supplemental data collection

Dan

Deb asked me to send you info on the additional sampling that we briefly discussed with Bob Wyatt & Jim McKenna after our FS roll-out meeting a couple of weeks ago. Bob's initial reaction was to question our expectation that the LWG fund and/or perform the work rather than a larger group of PRPs. We didn't get into any details with them at the time but agreed to have a follow up conversation soon.

let us know if you have any questions - as you can see we're farther along in our thinking about the fish tissue
Chip

Background

The Portland Harbor Baseline Risk Assessment identifies consumption of resident fish from Portland Harbor as the most significant pathway of exposure and highest risk to humans from exposure to contaminants at the site, especially PCBs. Fish tissue data collected in 2002 and 2007 as part of the RI supported the conclusions in the risk assessments, and a number of PCB source areas in sediment have been identified in the RI and draft FS.

The LWG is proposing monitored natural recovery as a major component of all of the alternatives that were developed and analyzed in the draft FS that was submitted on March 30th. Anticipating this, EPA approached the LWG last year to support collection of additional fish tissue. EPA's letter to the LWG stated that "the collection of smallmouth bass tissue is needed to provide information on current contaminant levels in tissue, to evaluate trends in contaminant levels, and to help establish a baseline for monitoring remedy effect effectiveness." EPA headquarters had some year-end money to help fund the effort in 2011, and the project team sought to leverage those funds with money from LWG to get the work done. We were subsequently advised that the LWG would not be joining the effort - the primary reason given was that the LWG was focused on the producing the FS report and didn't have the "bandwidth" to take it on - but that individual members might support the work. Although a couple of LWG members engaged in initial scoping discussions, the City was the only member who ended up participating. Because of funding constraints, data collection in 2011 was limited to PCB levels in smallmouth bass, a key indicator species in the food web model and PRG development. The 2011 sampling was a combined effort of the City (data collection), EPA HQ (data analysis) and EPA R10 (validation & sample prep).

Unfortunately, the CLP lab mishandled the preparation of the tissue samples for about 2/3 of the fish that were collected in 2011. The mishandled samples weren't analyzed, so there is a limited data (currently in data validation) from last year's work. It won't provide the information we had hoped for, although it will be useful in scoping the effort for 2012.

2012 Data Collection – fish tissue

- At a minimum, additional smallmouth bass tissue needs to be collected in late summer/early fall to achieve the objectives established last year. This is the optimal time for species collection and comparability to previous data sets. The detailed sampling and analysis plan developed from last year's effort could be used to streamline work planning.
- The project team does not anticipate that collection of the data will affect the overall project schedule. The team is confident that adequate data has been collected through the RI to support decision-making. If the data is collected timely, however, it could increase our confidence in decisions, particularly related to monitored natural recovery. The LWG's analysis of MNR relies heavily on modeling, which has significant uncertainties. MNR is a major component of all of the alternatives analyzed by the LWG.
- EPA's sediment remediation guidance highlights the monitoring needed to answer some basic questions on short-term and long-term risk reduction goals of sediment remedies, particularly those that rely on MNR and fish consumption advisories as part of the remedy. ie, do data demonstrate or at least suggest a reduction in fish tissue levels? EPA's monitoring guidance emphasizes the collection and analysis of repeated observations or measurements to evaluate changes in conditions and progress toward meeting objectives.

Sediment data collection

- Sediment data is needed to establish baseline conditions and observe trends to evaluate/verify model predictions and MNR rates of recovery. During preliminary discussions with the LWG for last year's tissue collection, some LWG members suggested that the effort should include sediment data collection.
- LWG previously proposed some sediment sampling as part of the RI to provide information for MNR evaluation. EPA did not approve that sampling plan, which proposed re-sampling specific single point sample locations from the RI, because EPA believed a more robust effort was needed given the variability in contaminant concentrations in most areas. Our current thinking is that a multi-increment sampling approach in specific target areas will better meet the objectives of LWG's initial proposal. EPA has not identified the specific areas or had discussions with LWG about this approach to date. One of the options the project team is contemplating for the proposed plan is an interim or contingency ROD addressing 8 to 10 primary source areas (PCB hot spots plus Arkema and GASCO) with monitoring and evaluation that would inform the final ROD. EPA has not discussed this approach in any detail with external parties.
- Collection of sediment data will require more upfront planning and discussions with the LWG than the fish tissue

collection. Although collection of this data in the same fall timeframe as the tissue collection would be ideal, it is not as critical from a timing standpoint.